

forrest, K.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

<b>USDC SDNY</b> <b>DOCUMENT</b> <b>ELECTRONICALLY FILED</b> DOC #: DATE FILED <b>FEB 03 2014</b>
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In re ALUMINUM WAREHOUSING ANTITRUST  
LITIGATION

Civil Action No. 13-md-2481

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TEAM WARD, INC., d/b/a WAR EAGLE BOATS,  
individually and on behalf of all others similarly situated,

Plaintiff,

Civil Action No. 13-cv-9062 (KBF)

v.

THE GOLDMAN SACHS GROUP, INC., GS POWER  
HOLDINGS LLC, METRO INTERNATIONAL TRADE  
SERVICES LLC, LONDON METAL EXCHANGE  
LIMITED, LME HOLDINGS LIMITED, and JOHN  
DOES 1-20,

Defendants.

STIPULATION AND  
~~PROPOSED~~ ORDER  
EXTENDING THE  
DEADLINE TO RESPOND TO  
THE COMPLAINT

**STIPULATION AND [PROPOSED] ORDER**

WHEREAS, on December 23, 2013, Team Ward, Inc. filed Civil Action No. 13-cv-9062  
("this Action");

WHEREAS, on December 30, 2013, the United States Judicial Panel on Multidistrict  
Litigation transferred multiple related actions to this Court pursuant to 28 U.S.C. § 1407,  
creating MDL No. 2481;

WHEREAS, on January 13, 2014, Plaintiff served Defendants The Goldman Sachs  
Group, Inc., GS Power Holdings LLC and Metro International Trade Services LLC (collectively  
"the GS Defendants"); and

WHEREAS, an initial conference in this Action and the related actions has been scheduled for February 6, 2014;


NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto, through their respective counsel, and subject to the Order of this Court, as follows:

1. The GS Defendants' time to answer, move or otherwise plead in response to any operative complaint filed by Plaintiff is hereby extended until after a consolidated complaint is filed in this Court, and that response shall be due on whatever date is ultimately set by the Court.

2. This stipulation does not constitute a waiver of the rights of any parties, including by Defendants of any jurisdictional defenses that may be available under Rule 12 of the Federal Rules of Civil Procedure, a waiver of any affirmative defenses under Rule 8 of the Federal Rules of Civil Procedure, or a waiver of any other statutory or common-law defenses that may be available to Defendants in this Action. Defendants retain their rights to raise any such defenses in response to any operative or amended complaint that may be filed relating to this action.

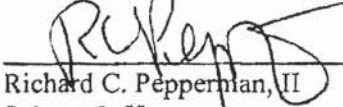
**STIPULATED AND AGREED TO THIS 28TH DAY OF JANUARY 2014.**

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*Attorneys for Team Ward, Inc.*

Dated: January 28, 2014

*Timing  
(to be discussed at  
the conference).*

SO ORDERED.

*K. B. Forrest*  
Katherine B. Forrest  
UNITED STATES DISTRICT JUDGE

1/31/14